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Via Email

January 22, 2002

Gloria Blue
Executive Secretary
Trade Policy Staff Committee
Office of the United States Trade Representative
600 Seventeenth Street, N.W.
Washington, DC 20508

Re: **Revised Public Comments on Potential Action Under Section 203 of the Trade Act of 1974 With Regards to Imports of Certain Steel: *Domestic Producers' Response to Requests to Exclude Products From Import Relief***

Dear Ms. Blue:

Pursuant to the Notice of Request for Comments (66 Fed. Reg. 54321, October 26, 2001, modified 66 Fed. Reg. 59599, November 29, 2001) and in response to the request received by email from Andrew Stephens on January 10, 2002, on behalf of The Committee on Pipe and Tube Imports; Allied Tube & Conduit Corporation; American Cast Iron Pipe Company, American Steel Pipe Division; Century Tube Corporation; Hannibal Industries, Inc.; IPSCO Tubulars Inc.; Leavitt Tube; LTV Copperweld; Lone Star Steel Company; Maverick Tube Corporation; Newport Steel Corporation, a division of the NS Group; Northwest Pipe Company; Searing Industries; Sharon Tube Company; Stupp Corporation; Tex-Tube Company; Vest Inc.; and Wheatland Tube Company, we

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hereby submit to the Office of the United States Trade Representative the public comments of the Domestic Producers' Response to Requests to Exclude Products From Import Relief. These comments specifically address requests for exclusion of certain carbon and alloy welded tubular products that have thus far been made available by USTR. We reserve the right to comment on any other exclusion requests that USTR receives.

Should you have any questions regarding this submission, please do not hesitate to contact the undersigned.

Respectfully submitted,

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Counsel for The Committee on Pipe and Tube Imports; Allied Tube & Conduit Corporation; American Cast Iron Pipe Company, American Steel Pipe Division; Century Tube Corporation; Hannibal Industries, Inc.; IPSCO

Tubulars Inc.; Leavitt Tube; LTV Copperweld; Lone Star Steel Company; Maverick Tube Corporation; Newport Steel Corporation, a division of the NS Group; Northwest Pipe Company; Searing Industries; Sharon Tube Company; Stupp Corpor

ation; Tex-Tube Company; Vest Inc.; and Wheatland Tube Company

Carbon and Alloy Welded Tubular Products

Welded, cold-drawn carbon and/or alloy tubing for airbag inflators (X-025)

Product Description:

1. Chemical and Physical Properties: C (0.06 Min, 0.13 Max); Si (0.35 Max); Mn (1.80 Min, 2.30 Max); P (0.030 Max); and S (0.010 Max)

2. Tensile Strength: High tensile strength, exact specifications not provided publicly.

Requested by: Sumitomo Metal Industries

Response: **Domestic Producers object to the exclusion of this product. LTV Copperweld and Lone Star Steel can manufacture this product.**

J525 hydraulic tubing (X-047)

Product Description: Welded tubing meeting SAE J525 specifications.

Requested by: Metalurgica de Tubos de Precisao Ltd

Response: **Domestic Producers object to the exclusion of this product. Lone Star Steel, LTV-Copperweld, and other domestic suppliers can manufacture this product.**

Tool Joints for Drill Pipe (X-064)

Product Description: Grant Prideco requests exclusion of tool joints for drill pipe. Tool joints covered in the Section 201 proceeding are used only for drill pipe. Tool joints are highly specialized fittings that are friction-welded to processed drill pipe tubes to complete joints of finished drill pipe. They enable the individual lengths, or joints, of drill pipe to be connected ot one another, forming a drill string.

Tool joints for drill pipe are used exclusively for this purpose. There are no substitutes for tool joints.

Tool joints are classified under HTS subheading 8431.43.8020 (tool joints, whether or not forged, suitable for use solely or principally with oil and gas machinery).

Requested by: GrantPrideco

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Large Diameter Line Pipe (X-66)

Product Description: Double submerged arc welded carbon line pipe of 18" diameter in 0.750" wall thickness or greater, in X60 grade or greater. These products are made to API 5L specifications plus additional, more stringent, customer specifications.

Requested by: Corus

Response: **Provided that this product is not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Large Diameter Line Pipe (X-069, X-71, X-102, X-139, and X-182)

Product Description:

1. Welded large diameter line pipe 18 inches to 22 inches in outside diameter ("OD") with wall thickness of 0.75 inches and greater.
2. Welded large diameter line pipe 24 inches to less than 30 inches OD: with a wall thickness of over 0.875 inches – Grades A/B/X42; with a wall thickness over 0.75 inches – Grades X-52 and X-56; with a wall thickness over 0.688 inches – Grades X60 and higher.
3. Welded large diameter line pipe 30 inches to less than 36 inches OD: with a wall thickness over 1.25 inches – Grades A/B/X42; with a wall thickness over 1 inch – Grades X-52 and X-56; with a wall thickness over 0.875 inches – Grades X60 and higher.
4. Welded large diameter line pipe 36 inches ot less than 42 inches OD: with a wall thickness over 1.375 inches – Grades A/B/X42; with a wall thickness over 1.25 inches – Grades X-52 and X-56; with a wall thickness over 1.125 inches – Grades X60 and higher.
5. Welded large diameter line pipe 42 inches to through 64 inches OD: with a wall thickness over 1.5 inches – Grades A/B/X42; with a wall thickness over 1.375 inches – Grades X-52 and X-56; with a wall thickness over 1.25 inches – Grades X60 and higher.
6. Welded large diameter line pipe having an outside diameter equal to 48 inches, with a wall thickness measuring 1.0 inch or greater, in grades X-80 or greater.

7. Welded large diameter line pipe with an outside diameter measuring greater than or equal to 64 inches regardless of wall thickness or grade.

Requested by: Williams Co., BP America, European Steel Tube Association, and Kawasaki Steel Corporation, Nippon Steel Corporation, NKK Corporation, and Sumitomo Metal Industries, Ltd.

Response: **Provided that these product are not produced by other U.S. manufacturers, Domestic Producers do not object to the exclusion of these product.**

Certain Small Diameter, Thin Wall, Carbon and Alloy Welded Tubular Products Used in Automotive Fluid Delivery Systems (X-074)

This product is typically manufactured form low carbon, cold-rolled steel sheet. This base steel material is UNS G10060 or UNS G10080, also referred to as SAE 1006 or SAE 1008. The outside diameter never exceeds 38.1 mm (1.5 inches) and the wall thickness is always less than 1.65 mm (0.065 inches).

This product may be provided in several different surface finishes, depending on the application and desired level of corrosion resistance. Typical treatments applied over the base steel substrate include but are not limited to zinc/aluminum galvanizing, epoxy paints, and nylon or other polymers.

Requested by: Cooper Tire & Rubber Company

Response: **Domestic Producers object to the exclusion of this product. LTV Copperweld believes it can manufacture this product, although it requires more specifications to make a definitive determination.**

Certain welded cold-drawn DOM tubing used in oil lift pumps and produced to ASTM Standard A-513 grade 1026 type 6 (X-097)

Product Description:

1. **Mechanical properties:** tensile strength = 75,000 psi; yield strength = 65,000 psi; elongation = 10%.
2. **Hardness:** 90 HRB (min) and 23 HRC (Max).

3. **Chemical Composition:** Carbon (0.22-0.28); Manganese (0.60-0.90); Phosphorous (0.040 Max); Sulfur (0.050 Max).
4. **Surface Finish:** 63 RMS (Max).
5. **Inner/Outer Diameter Specifications:**
   OD Range: 1.500" to 3.75"
   ID Range: 1.25" to 3.25"

Requested by: Katakura Steel Tube Co., Ltd.

Response: **Domestic Producers object to the exclusion of this product. LTV Copperweld and other domestic suppliers can manufacture this product.**

Large Diameter Line Pipe (X-102)

Product Description:

1. **Welded LDLP in Grades Greater than API Grade X80 (i.e., with Yield Stengths Substantially Above that of X80)**

2. **Welded LDLP in grades X80 of Above, with OD 48" or Greater, With WT of 0.900" or More**

Requested by: B P America

Response: **Domestic Producers object to the exclusion of these product to the extent that the exclusion requests encompass products that were not excluded from the recent antidumping investigation on large diameter line pipe from Japan.**

9% chrome, 1% molybdenum welded cold-drawn (DOM) tubing (X-132)

Product Description:

DOM tubing for electric submersible oil pump motors has the following chemical composition: C (≤0.15%). Si (0.25-1.00%), Mn (0.30 -0.60%), P(≤0.030%), S (≤0.030%), Cr (8.00 - 10.00%), Mo (0.90 -1.10%) (for all contents, Min/Max inclusive).
Scot purchases the tubing from SMI with 3.75 - 6.765 inch OD in various lengths.

Requested by: SMI/Scot Industries

Response: **Provided that this product is not produced by any U.S. manufacturers, Domestic Producers do not object to the exclusion of this product.**

Tubes for assembled camshafts (X-162)

Product Description:

Certain precision, cold-drawn over mandrel ("DOM") welded steel tubes, either in long length, cut-to-length or fully machined, ready to use are used by the U.S. automotive industry to produce assembled camshafts. Camshafts are used in internal combustion engines to actuate vales at precise timing intervals.

Rothrist's hollow camshaft tubes result in a light-weight and cost-effective product that reduces vibration and is able to withstand high valve train loads. Camshafts undergo rigorous testing before they are used in automobile engines and must operate with absolute precision. Rothrist manufactures its camshaft tubes to meet the following chemical, physical and mechanical specifications:

Material characteristics:

26 Mn 5 mod	High Strength Steel
St 52.3	No decarburization
	Excellent hardness
	Well-suited for cold forming
	Fine grain structure
	Very high repeatability, no inclusions and consistent material properties

Typical tube size:

Diameter: between 20 mm and 30 mm
Wall thickness: between 2.0mm and 5.0 mm

Requested by: Rothrist Tube Switzerland

Response: **Domestic Producers object to the exclusion of this product. LTV Copperweld and Lone Star Steel can manufacture this product.**

Tubes for swaged or straight propshafts (X-162)

Product Description:

Certain precision, DOM welded steel tubes, either cut-to-length or cut-to-length and rotary swaged, both ready to use are used by the U.S. automotive industry to produce hollow propshafts. Propshafts consist of one or more thin-walled tubular shafts connected by universal, or other, joints and

transmit torque and rotation motion at fixed or varying angles form the engine to the wheels via a differential or drive unit.

Propshafts are made either with: (i) straight tubes; (ii) swaged tubes with a transition angle of about 15degrees; or (iii) swaged tubes with a transition angle of about 50 degrees. The latter tubes, also known as "slip-in-tubes," exhibit enhanced crash features under which the two parts of the tube collapse into each other. Saged tubes also eliminate the need for conventional steel slip and forged stud yokes, increasing efficiency, reducing weight and improving noise and vibration. Rothrist manufactures its propshaft tubes to meet the following chemical, physical and mechanical specifications:

Material characteristics:

26 Mn 5 mod	High Strength Steel: tensile strength> 800N/mm^2
C 22	Well-suited for cold forming
	Fine grain structure
	Very high repeatability, no inclusions and consistent material properties

Typical tube size:

Diameter: between 50 mm and 80 mm
Wall thickness: between 1.5mm and 2.0 mm

Requested by: Rothrist Tube Switzerland

Response: **Domestic Producers object to the exclusion of this product. LTV Copperweld and other domestic suppliers can manufacture this product.**

<u>Tubes for shock absorbers (X-162)</u>

Product Description:

Certain precision, DOM welded steel tubes, cut-to-length which are used by the U.S. automotive industry to produce high-qual8ity shock absorbers. These high-end shock absorbers are produced according to an advanced manufacturing process that eliminates "ballizing." (Ballizing is an expensive finishing process that pushes a ball through a tube in order to smoothen the ID and ensure absolute roundness.)

Rothrist tubes are used to manufacture monotube shock absorbers or working cylinders of twintube shock absorbers. Rothrist's tubes reduce end-user manufacturing costs by: (i) eliminating ballizing; (ii) eliminating expensive hot forming because the material ha excellent deep drawing properties enabling closure of one end of the cylinders by cold forming; and (iii) offering tubes with

exceptionally low reject rates. Rothrist manufactures its tubes for shock absorbers to meet the following chemical, physical and mechanical specifications:

Material characteristics:

St 37.2	High Strength Steel
St 44.2	Well-suited for cold forming
St 52.3	Very high repeatability, no inclusions and consistent material properties

Typical tube size:

Diameter: between 30 mm and 50 mm
Wall thickness: between 1.0 mm and 2.5 mm

Requested by: Rothrist Tube Switzerland

Response: **Domestic Producers object to the exclusion of this product. LTV Copperweld and other domestic suppliers can manufacture this product.**

Tubes for gas springs (X-162)

Product Description:

Certain DOM welded steel tubes which are used to produce gas springs for the U.S. automotive industry (*e.g*, for trunks or hatch-back-type doors) and/or to achieve the pneumatic function (adjustable height) of swivel chairs for the furniture industry.

Rothrist's tubes: (i) maintain a very smooth ID surface with perfect circularity, eliminating the need for ballizing; (ii) demonstrates excellent deep drawing properties that are necessary for closing one end of the tube through a cold forming process; and (iii) offer a high-qualtiy weld resulting in an absolute leak-proof prodcut. Rothrist is able to manufacture these tubes with exceptionally low reject rates ensuring reliability and durability, paramount for surviving in the very competitive gas spring market. Rothrist manufactures its tubes for gas springs to meet the following chemical, physical and mechanical specifications:

Material characteristics:

St 37.2	High Strength Steel
St 44.2	Well-suited for cold forming
St 52.3	Very high repeatability, no inclusions and consistent material properties

Typical tube size:
Diameter: between 15 mm and 30 mm
Wall thickness: between 1.0 mm and 2.5 mm

Requested by: Rothrist Tube Switzerland

Response: **Domestic Producers object to the exclusion of this product. LTV Copperweld can manufacture this product.**

Tubes for steering cylinders (X-162)

Product Description:

Certain DOM welded steel tubes are used by the U.S. automotive industry to produce high performance hydraulic steering cylinders. Rothrist's tubes allow steering cylinder manufacturers to cut costs because of: (i) excellent ID surface and perfect circularity eliminating expensive honing (*i.e.*, reworking the inner side of the tube with a special cutting tool that is pushed through the tube in order to machine the ID surface and to make sure the ID is absolutely round); and (ii) very low reject rates of finished products. Rothrist manufactures its tubes for steering cylinders to meet the following chemical, physical and mechanical specifications:

Material characteristics:

St 37.2	High Strength Steel
St 44.2	Very high repeatability, no inclusions and consistent
St St 52.3	material properties

Typical tube size:
Diameter: between 40 mm and 50 mm
Wall thickness: between 2.0 mm and 3.5 mm

Requested by: Rothrist Tube Switzerland

Response: **Domestic Producers object to the exclusion of this product. LTV Copperweld and other domestic suppliers can manufacture this product.**

Tubes for half shafts (X-162)

Product Description:

Certain precision, DOM welded steel tubes, cut-to-length which are used by the U.S. automotive industry to produce hollow half shafts (also called drive shafts). Half shafts are subsystems that drive the front or rear wheels of a vehicle. High-end hollow (tubular) half shafts: (i) reduce overall weight by 30 percent; (ii) significantly improve passenger comfort by reducing vibrations; and (iii) enhance fuel efficiency.

Rothrist's tubes demonstrate high strength, tight wall thickness tolerances and excellent cold forming properties. Rothrist has adapted these tubes to rotary hammering and spline pressing, which are cold forging processes used to shape the tubes. Rothrist manufactures its half shaft tubes to meet the following chemical, physical and mechanical specifications:

Material characteristics:

26 Mn 5 mod	High Strength Steel: tensile strength> 800N/mm^2
34 Mn 5 mod	No decarburization
	Excellent hardness
	Well-suited for cold forming
	Fine grain structure
	Very high repeatability, no inclusions and constant material properties

Typical tube size:

Diameter: between 30 mm and 50 mm
Wall thickness: between 4.0 mm and 6.0 mm

Requested by: Rothrist Tube Switzerland

Response: **Domestic Producers object to the exclusion of this product. LTV Copperweld, Lone Star Steel, and other domestic suppliers can manufacture this product.**

<u>Other precision drawn over mandrel steel tubes (X-162)</u>

Product Description:

(1) Certain other precision welded DOM steel tubes used by the U.S. automotive industry in the manufacture of steering columns and hollow stabilizer bars; and (2) precision welded cold DOM

steel profiles used by the U.S. agriculture vehicle and machinery industry in the manufacture of hollow telescopic power take off shafts.

These tubes are highly customized and designed for very specific, high-end, high-performance applications that vary form market to market. Examples include:

- **$** tubes for steering columns that increase safety and enhance operating performance and fuel economy;
- **$** hollow stabilizer bars which are part of the suspension system (also known as anti-roll bars) and link wheels on opposite sides of the vehicle reducing the sway of a car when cornering at higher rpm's. Due to their size, stabilizer bars are most efficient when they are hollow and, therefore, must meet very strict performance and durability requirements; and
- **$** telescopic power take-off profile tubes used in agriculture vehicles where high-torque transmission and excessive wear are factors. The dimensional accuracy of the OD and ID, the material strength and the excellent surface hardness guarantee extended durability under rough operating conditions.

Although Rothrist manufactures these tubes for very specific applications based on customer preferences and requirements, generally, these tubes demonstrate the following characteristics:

Typical Tube Sizes:

Steering Columns: Diameter between 20 mm and 40 mm,
Wall thickness between 2.0 mm and 3.5 mm.

Stabilizer Bars: Diameter between 17 mm and 35 mm
Wall thickness between 2.5 mm and 4.0 mm

Profile Tubes: Diameter between 30 mm and 60 mm
Wall thickness between 3.0 mm and 5.0 mm

Requested by: Rothrist Tube Switzerland

Response: **Domestic Producers object to the exclusion of this product. LTV Copperweld, Lone Star Steel, and other domestic suppliers can manufacture this product.**

Large Diameter Line Pipe (X-178)

Product Description:

High-specification large diameter welded line pipe, API grades X65 and X70, with outside diameter 18 inches and greater, and with wall thickness 0.562 inches and greater.

Requested by: Confab

Response: **Domestic Producers object to the exclusion of these product to the extent that the exclusion requests encompass products that were not excluded from the recent antidumping investigation on large diameter line pipe from Japan.**

A513 type 5 DOM (X-180)

Product Description:

0.7990" outside diameter, 0.6420" inside diameter, A513 type 5 DOM, 1020 carbon, 90 ksi minimum tensile strength

Requested by: V/R Tubular Products

Response: **Domestic Producers object to the exclusion of this product. LTV-Copperweld believes it can manufacture this product, although it would require review of other specifications before committing to production.**

A513 type 6 DOM (X-180)

Product Description:

4.774" outside diameter, 4.55" inside diameter, A513 type 6 DOM, 1020 carbon.

Requested by: V/R Tubular Products

Response: **Domestic Producers object to the exclusion of this product. LTV-Copperweld believes it can manufacture this product, although it would require review of other specifications before committing to production.**

High Frequency Induction Welded Line Pipe for Deep Water Applications (X-182)

Product Description:

Longitudinally high frequency induction welded line pipe made in strict accordance to the API-5L standards and is used in the transportation of oil and gas. Line pie is also certified to a customer's proprietary specifications which are more stringent than the requirements of API-5L, but is allowed under the API-5L specification as per the SR sections.

Requested by: European Steel Tube Association

Response: **Domestic Producers object to the exclusion of these products to the extent that the exclusion request encompasses products that were not excluded from the recent antidumping investigation on large diameter line pipe from Japan. Domestic Producers object to any exclusion that distinguishes products by weld type or end use application.**

Spirally Submerged Arc Welded Line Pipe (X-182)

Product Description:

Spirally submerge arc welded line pipe manufactured via the new two-step welding process made in strict accordance to the API-5L standards and is used in the transportation of oil and gas. Line pipe is also certified to a customer's proprietary specifications which are more stringent than the requirements of API-5L, but is allowed under the API-5L specification as per the SR sections.

Requested by: European Steel Tube Association

Response: **Domestic Producers object to the exclusion of these product to the extent that the exclusion request encompasses products that were not excluded from the recent antidumping investigation on large diameter line pipe from Japan. Domestic Producers object to any exclusion that distinguishes products by weld type or end use application.**

Welded Tubing for Automotive Fuel Pumps (X-185)

Product Description:

Cold drawn-DOM - tubing type 5, including delivery conditions according to ASTM A-513-97, steel grade MT 1010 with special conditions/requirements and surface conditions.

Requested by: European Steel Tube Association and Mannesmann Prazisrohr GmbH of Germany

Response: **Domestic Producers object to the exclusion of this product. LTV Copperweld is capable of manufacturing this product.**

Welded Cold Drawn Profile Tubing (X-185)

Product Description:

Description and technical conditions for cold drawn profiles according to DIN 2393-C, 09,94.

Requested by: European Steel Tube Association and Mannesmann Prazisrohr GmbH of Germany

Response: **Domestic Producers object to the exclusion of this product. LTV Copperweld is capable of manufacturing this product.**

Welded Elliptical Structural Tubing (X-186)

Product Description:

Welded elliptical structural tubing. ASTM A501 ("Standard Specification for Hot-Formed Welded Carbon Steel Structural Tubing"), Chapter 10, points 10.4 ("special shape structural tubing") and 10.5 ("other sizes"). This product can be easily distinguished form structural tubing for which exclusion is not sought by the elliptical shape of the tube.

Requested by: European Steel Tube Association and Tubeurop France

Response: **Domestic producers object to the exclusion of this product. LTV-Copperweld makes this product.**